

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

INA STEINER, DAVID STEINER, and  
STEINER ASSOCIATES, LLC,

Plaintiffs,

v.

EBAY INC., *et al.*,

Defendants.

Civil Action No. 1:21-CV-11181-DPW

**NOTICE OF RECEIPT OF DISCOVERY RESPONSES**

The United States of America (the “Government”), by and through undersigned counsel, respectfully submits this Notice to update the Court and parties on discovery materials it has received from Defendants Devin Wenig and Steve Wymer. The Government reports as follows:

1. On December 6, 2023, the Court held a hearing on the Government’s Motion for Protective Order, ECF No. 273. At the conclusion of the hearing, the Court ordered that “Within 30 days, Plaintiffs shall serve interrogatories and document requests on Defendants eBay, Wenig, Wymer, and Jones regarding their knowledge about Defendant Baugh[’]s background. Responses shall be submitted to the Government within 30 days. The Government shall have 30 days to object to the filing of the responses on the public record.” ECF No. 306.

2. During the December 6 hearing, the Court also directed Defendants eBay, Jones, Wenig, and Wymer to meet and confer with the Government concerning a secure method for producing their responses to Plaintiffs’ interrogatories and document requests to the Government. The Government has met and conferred with all four Defendants and reached agreement on a secure means of producing those Defendants’ discovery responses.

3. On January 5, 2024, the Court entered a Protective Order, which stated in relevant

part that “Plaintiffs may file interrogatories and document requests on Defendants eBay, Wenig, Wymer, Jones, and Baugh relating to their knowledge, if any, of Defendant Jim Baugh’s work for the CIA or FBI. The responses shall be disclosed to the Government and filed under seal with the Court. Within 14 days of receipt of the responses, the Government shall inform the Court whether it objects to public disclosure of the responses.” ECF No. 315 ¶ 1(b).

4. On January 16, Defendants Wenig and Wymer produced a copy of their interrogatory responses to a Department of Justice (“DOJ”) Physical Security Specialist for the Government to review. Defendants Wenig and Wymer also filed a copy of their responses with the Court by lodging them with the DOJ Physical Security Specialist for the Court to review. If the Court chooses to conduct such a review, the DOJ Physical Security Specialist will make the responses available to the Court for review at the Court’s convenience.

5. In Compliance with the Court’s January 5 order, the Government will review the interrogatory responses of Defendants Wenig and Wymer and inform the Court of whether it objects to disclosure of the responses by no later than January 30.

Dated: January 16, 2024

Respectfully submitted,

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